

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-209-E**

**IN RE:** )  
 )  
**South Carolina Energy Freedom Act (House** )  
**Bill 3659) Proceeding Related to Dominion** )  
**Energy South Carolina, Incorporated and S.C.** )  
**Code Ann. Section 58-41-30 Related to** )  
**Electrical Utilities and Their Current** )  
**Voluntary Renewable Energy Program, and** )  
**Such Other Proceedings Required By the** )  
**Commission** )

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**DIRECT TESTIMONY AND EXHIBIT OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART INC.**

**NOVEMBER 24, 2020**

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**Exhibits**

**Exhibit LVP-1:**      Witness Qualifications Statement

**I. Introduction**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.**

A. My name is Lisa V. Perry. My business address is 2608 SE J Street, Bentonville, AR 72716-0550. I am employed by Walmart Inc. ("Walmart") as Senior Manager, Energy Services.

**Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?**

A. I am testifying on behalf of Walmart.

**Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

A. I received a J.D. in 1999 and a LL.M. in Taxation in 2000 from the University of Florida Levin College of Law. From 2001 to 2019, I was in private practice with an emphasis from 2007 to 2019 in Energy Law. My practice included representing large commercial clients before the utility regulatory commissions in Colorado, Texas, New Mexico, Arkansas, and Louisiana in matters ranging from general rate cases to renewable energy programs. I joined the energy department at Walmart in September 2019 as Senior Manager, Energy Services. My Witness Qualifications Statement is attached as Exhibit LVP-1.

**Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION ("COMMISSION")?**

A. Yes; I submitted testimony in Docket Nos. 2019-239-E and 2020-125-E.

1       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**  
2       **REGULATORY COMMISSIONS?**

3       A.     Yes, I have submitted testimony with State Regulatory Commissions for Arkansas,  
4             Colorado, Florida, Kentucky, Louisiana, Michigan, Oklahoma, Texas, and Virginia. I  
5             have also provided legal representation for customer stakeholders before the State  
6             Regulatory Commissions for Colorado, Texas, Arkansas, Louisiana, and New Mexico in  
7             the cases listed under "Commission Dockets" in Exhibit LVP-1.

8       **Q.     ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

9       A.     Yes. I am sponsoring the exhibit listed in the Table of Contents.

10      **Q.     PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN SOUTH CAROLINA.**

11      A.     As shown on Walmart's website, Walmart operates 123 retail units and four  
12             distribution centers in South Carolina, employing over 32,000 associates. In fiscal year  
13             ending 2020, Walmart purchased \$910.5 million worth of goods and services from  
14             South Carolina-based suppliers, supporting over 24,000 supplier jobs.<sup>1</sup>

15      **Q.     PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE SERVICE**  
16      **TERRITORY FOR DOMINION ENERGY SOUTH CAROLINA, INCORPORATED ("DESC" OR**  
17      **"COMPANY").**

18      A.     Walmart has approximately 34 retail stores and related facilities in DESC's service  
19             territory.

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<sup>1</sup> <http://corporate.walmart.com/our-story/locations/united-states/south-carolina>

1       **Q.     HAS WALMART ESTABLISHED CORPORATE RENEWABLE ENERGY GOALS?**

2       A.     Yes. Walmart has long had aggressive and significant renewable energy goals. On  
3             September 21, 2020, Walmart updated these goals, stated its intentions to: (1) be  
4             supplied 100 percent by renewable energy by 2035; and (2) achieve zero carbon  
5             emissions in our operations, including our transportation fleet vehicles, without the  
6             use of offsets, by 2040. Walmart has also set a goal to transition to low-impact  
7             refrigerants for cooling and electric equipment for heating by 2040.<sup>2</sup>

8       **Q.     DOES WALMART DESIRE TO USE RENEWABLE ENERGY FOR ITS OPERATIONS?**

9       A.     Yes. To date, Walmart has contracted for or currently takes electricity from one or  
10            more renewable resources in at least 29 states and Puerto Rico.

11       **Q.     CAN YOU PROVIDE INSIGHT INTO WALMART'S GENERAL FRAMEWORK FOR**  
12           **EVALUATING RENEWABLE OPPORTUNITIES?**

13       A.     Yes. Walmart's desire for renewable energy resources must be balanced against its  
14            business needs. As a general rule, Walmart does not enter into premium structures  
15            or programs that only result in additional costs to our facilities. Rather, Walmart seeks  
16            renewable energy resources that deliver industry-leading cost, including renewable  
17            and project specific attributes such as renewable energy credits ("RECs"), within  
18            structures where the value proposition allows the customer to receive any potential  
19            benefits brought about by taking on the risk of being served by that resource instead

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<sup>2</sup> <https://corporate.walmart.com/newsroom/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>

of, or in addition to, the otherwise applicable resource portfolio. Additionally, Walmart does not enter into programs with contract terms in excess of 15 years.

**Q. WHAT CHANNELS DOES WALMART UTILIZE TO SECURE RENEWABLE ENERGY RESOURCES?**

A. To meet our renewable energy goals, Walmart utilizes three primary channels to secure renewable energy resources:

- **Contracting for off-site resources:** These products are typically structured to replace other energy, both physically and on the bill. This mechanism allows Walmart to leverage its scale to drive the best project economics while simultaneously minimizing transaction time and costs. To date, Walmart has contracted for these resources in deregulated markets through Texas Retail Energy, LLC, a competitive electric supplier wholly owned by Walmart that serves as our electric supplier in most deregulated retail markets, to directly serve our load. We have also entered into "Virtual Power Purchase Agreements" in deregulated wholesale markets, which do not directly serve our load but allow us to bring new large-scale renewable resources to the market.
- **Contracting for on-site resources:** Walmart contracts for on-site, behind the meter resources through power purchase agreements ("PPAs") and leases that allow performance guarantees. These resources replace grid energy and are priced with the expectation that the operating costs for the site are reduced.
- **Utility partnerships:** Walmart works with its utility partners to develop useable commercial and industrial programs and economic structures targeted to function

1 within the confines of the regulatory compact and with minimal impact to non-  
2 participating customers. When this option is pursued, Walmart does not seek a  
3 Walmart-only program, but instead works to ensure that such programs can be  
4 used by a broader group of large commercial and industrial customers. Walmart  
5 leverages its significant in-house rate and regulatory expertise to create  
6 opportunities to move the entire industry forward. The largest of these  
7 partnerships to date include the development of and participation in Florida  
8 Power & Light Company's SolarTogether Program, Georgia Power Company's  
9 Renewable Energy Development Initiative Program,<sup>3</sup> and Alabama Power  
10 Company's 72 MW solar farm in Alabama.<sup>4</sup> While Walmart assisted in developing  
11 these opportunities, the opportunities are open to other large customers.

12 **Q. DID WALMART HAVE CONVERSATIONS WITH DESC ABOUT THE VOLUNTARY**  
13 **RENEWABLE ENERGY ("VRE") RIDER PROPOSED IN THIS DOCKET?**

14 **A.** No. However, Walmart is generally engaged with the Company regarding customer-  
15 facing renewable programs.

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<sup>3</sup> <https://www.greenbiz.com/article/how-google-and-walmart-work-utilities-procure-clean-power>

<sup>4</sup> <http://www.alabamane.wscenter.com/2018/01/02/chambers-county-solar-project-now-serving-alabama-power-customers/>

**II. Purpose of Testimony and Summary of Recommendations**

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to address aspects of DESC's VRE Rider, which was initially filed with the Commission on September 13, 2019 ("Original Filing"), and was subsequently updated in the Company's November 10, 2020, filing ("Updated Filing").

**Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE COMMISSION.**

A. If the Commission approves the VRE Rider, Walmart recommends that the Commission make the following changes to the term requirements for Renewable Generation ("RG") Supply Agreements and related PPAs:

1) The Commission should change the overall term limit to a maximum of 20 years while still providing the participating customer with the flexibility to enter into shorter-length RG-Supply Agreements (for a minimum of one year) at the customer's option.

2) Rather than limiting the applicable contract term to the length of the participating customer's electric service contract without taking into consideration any automatic renewals of that contract, Walmart recommends that the Commission assume the participating customer's electric service contract will automatically renew for the number of renewal periods authorized under the customer's service contract, up to the 10-year (or 20-year if Walmart's recommendation above is accepted) overall limitation. In the event the Company already intends for this language to take into consideration subsequent automatic renewal periods then the Commission should modify the tariff language to clearly reflect this intent.



1       **Q.       DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION ADVOCATED**  
2       **BY THE COMPANY INDICATE WALMART'S SUPPORT?**

3       A.       No. The fact that an issue is not addressed herein or in related filings should not be  
4       construed as an endorsement of, agreement with, or consent to any filed position.  
5

6       **III. VRE Rider**

7       **Q.       WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S ORIGINAL FILING?**

8       A.       It is my understanding that the Company filed its Original Filing pursuant to the  
9       requirements of S.C. Code Ann. § 58-41-30 and is seeking approval of its VRE Rider as  
10      part of its proposed voluntary renewable energy program. *See* Original Filing, p. 1.

11      **Q.       WHAT IS YOUR GENERAL UNDERSTANDING OF THE PROPOSED VRE RIDER?**

12      A.       At a high level, my general understanding is that the Company's proposed VRE Rider  
13      is a mechanism through which eligible customers have the opportunity to procure  
14      renewable energy in a way that allows the participating customer to receive  
15      generation from that renewable resource and receive credit for the renewable  
16      attributes (*i.e.*, the "RECs") while holding non-participating customers harmless.

17      **Q.       PLEASE EXPLAIN.**

18      A.       Under the proposed VRE Rider, an eligible customer can negotiate with a third-party  
19      renewable energy provider ("Supplier") to acquire power and the associated RECs at  
20      a negotiated cost. *See* Direct Testimony of John E. Folsom, Jr. ("Folsom Direct"), p. 4,  
21      lines 2-7. The customer then enters into an agreement with the Supplier through a  
22      pre-approved form contract ("RG-Supply Agreement"). *See id.* In turn, the Company

enters into a PPA with the Supplier that is consistent with the form PPA approved in Docket No. 2019-184-E. *See id.* at p. 4, lines 8-12.

**Q. WHAT IS THE ECONOMIC ARRANGEMENT BETWEEN THE COMPANY, PARTICIPATING CUSTOMER, AND SUPPLIER AS OUTLINED IN THE VRE RIDER TARIFF SHEET?**

A. Based on my review of the Company's testimony and the proposed VRE Rider tariff sheet set forth in the Company's Updated Filing: (i) the Company pays to the Supplier the "Net Energy Rate" due under the PPA and assigns to the Supplier all its rights in "RG Costs" paid by the participating customer; (ii) the participating customer pays to the Company its billed costs under the customer's normal tariff and also pays a "Product Charge" and a monthly administrative fee (\$375 per customer plus \$50 per additional meter or account subject to the RG-Supply Agreement); and (iii) the Company credits the participating customer for its pro rata share of the "Net Energy Rate." *See id.*, Exhibit \_\_\_\_ (JEF-1), pp. 3-4.

**Q. WHAT IS THE NET ENERGY RATE?**

A. The Net Energy Rate is the total charge for the delivery of energy and capacity as specified in the governing PPA, and at the participating customer's option, is based on the "then Commission-approved methodology for either

1. The levelized avoided cost rates for energy and capacity established at the time of contracting; or
2. The levelized avoided cost rate for capacity and the day-ahead rate for energy on the Company's system applied on an hourly basis to the energy provided to the

Company's system by the Supplier." *See id.*, Exhibit \_\_\_\_ (JEF-1), p. 1, Power Purchase Agreement.

**Q. WHAT ARE RG COSTS?**

A. RG Costs are additional costs over the Net Energy Rate as set forth in the RG-Supply Agreement. *See id.*

**Q. WHAT IS THE PRODUCT CHARGE?**

A. The Product Charge is the participating customer's pro-rata portion of the Net Energy Rate plus RG Costs. *See id.*, Exhibit \_\_\_\_ (JEF-1), p. 3, Assignment and Crediting of Payments at ¶ 2.

**Q. BASED ON THE ABOVE, HOW WOULD YOU SUMMARIZE THE PARTICIPATING CUSTOMER'S COSTS AND BENEFITS UNDER THE VRE RIDER?**

A. Based upon my reading of the Updated Filing, in addition to administrative fees, a participating customer is responsible for bearing all costs due under the RG-Supply Agreement while receiving a credit based, at the election of the customer, on either a fixed or variable levelized avoided cost. *See id.* at p. 5, line 18 through p. 7, line 2.

**Q. WHAT CUSTOMERS ARE ELIGIBLE FOR THE VRE RIDER AS PROPOSED?**

A. The VRE Rider would be available to non-residential customers with new or existing contract demand greater than or equal to one megawatt either at a single location or across multiple locations within the Company's service territory. *See id.* at p. 3, lines 13-17 and Exhibit \_\_\_\_ (JEF-1), p. 1.

1       **Q.       ARE THERE LIMITS ON A PARTICIPATION IN THE VRE RIDER?**

2       A.       Yes. The total capacity committed under the VRE Rider is 135 megawatts and is filled  
3               on a first come, first served basis. *See id.* at p. 3, lines 18-22 and Exhibit \_\_\_\_ (JEF-1),  
4               p. 1. Additionally, capacity provided to a participating customer under the VRE Rider  
5               is limited to 125% of that customer's contracted demand. *See id.* at p. 7, lines 8-9.

6       **Q.       IS THERE A LIMIT TO THE DURATION OF THE RG-SUPPLY AGREEMENT AND PPA?**

7       A.       Yes. The length of the RG-Supply Agreement and the associated PPA must be of equal  
8               duration and neither agreement can exceed the lesser of (a) 10 years, or (b) the  
9               remaining term of the participating customer's electric service contract with regard  
10              to the VRE Rider, whichever expires first without considering automatic renewable  
11              terms. *See Folsom Direct*, p. 5, lines 13-17.

12  
13      **IV. Walmart's Comments and Recommendations**

14      **Q.       WHAT IS WALMART'S OVERALL IMPRESSION OF THE PROPOSED VRE RIDER?**

15      A.       Overall, Walmart is generally supportive of the VRE Rider as it is a mechanism through  
16               which non-residential customers are able to procure renewable energy at competitive  
17               prices, which not only provides commercial customers an opportunity to advance  
18               their renewable energy goals, but also creates positive operational and reputational  
19               momentum for the utility and its customers. Except as detailed below, Walmart does  
20               not have any significant concerns with the Company's proposed VRE Rider.

1       **Q.     WHAT ARE WALMART'S SPECIFIC CONCERNS REGARDING THE COMPANY'S**  
2       **PROPOSED VRE RIDER?**

3       A.     Walmart has two concerns with the Company's proposed term limitations for the RG-  
4       Supply Agreement and related PPA. Specifically, the Company proposes to limit the  
5       term of the RG-Supply Agreement and PPA to the shorter of (i) 10 years, or (ii) the  
6       remaining term of the participating customer's electric service contract "not  
7       considering automatic renewal terms." See *id.* and Exhibit \_\_\_\_ (JEF-1), p. 2.  
8       Walmart's first concern is with the language related to the overall 10-year limitation.

9       **Q.     WHY IS WALMART CONCERNED WITH THE OVERALL 10-YEAR LIMITATION?**

10      A.     One of the benefits that the VRE Rider will provide to participating customers is the  
11      opportunity for that customer to negotiate with a Supplier and potentially secure  
12      favorable pricing for renewable energy. However, the length of the contract term has  
13      a direct impact on a customer's Supplier options and pricing. An RG-Supply  
14      Agreement with a longer potential term opens up more Suppliers who are willing to  
15      enter into this Agreement and at more favorable pricing to the customer. Walmart is  
16      concerned that the 10-year maximum term proposed by the Company for RG-Supply  
17      Agreements and PPAs executed under the VRE Rider will limit a participating  
18      customer's access to potential Suppliers and negatively impact the price at which the  
19      customer can procure renewable energy.

1       **Q.       WHAT IS WALMART'S RECOMMENDATION WITH REGARD TO THE OVERALL 10-YEAR**  
2       **TERM LIMITATION?**

3       A.       Walmart recommends that the Commission change the overall term limitation to a  
4       maximum of 20 years while still providing the participating customer with the  
5       flexibility to enter into shorter-length RG-Supply Agreements (for a minimum of one  
6       year<sup>5</sup>) at the customer's option. I note that allowing a customer to enter into an RG-  
7       Supply Agreement for a term up to 20 years is in line with the Green Source Advantage  
8       Program for which Duke Energy Carolinas, LLC and Duke Energy Progress, LLC are  
9       currently seeking approval from the Commission in Docket No. 2018-320-E.<sup>6</sup>

10      **Q.       WHAT IS WALMART'S OTHER CONCERN WITH THE PROPOSED VRE RIDER?**

11      A.       Walmart's other concern is with the Company's second basis for limiting the term,  
12      namely the portion of the tariff that states that the RG-Supply Agreement and PPA  
13      are limited to the participating customer's electric service contracts, "not considering  
14      automatic renewal terms." *See id.*, Exhibit \_\_\_\_ (JEF-1), p. 2. After reading this  
15      language within the context of the "Term" Section of the updated VRE Rider tariff  
16      sheet, it appears that the Company intends to measure the second term limitation  
17      based on the customer's current electric service contract assuming it will *not* renew.

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<sup>5</sup> The tariff sheet for VRE Rider also specifically states that no RG-Supply Agreement or PPA shall be for a term of less than one year. *See id.*, Exhibit \_\_\_\_ (JEF-1), p. 2. Walmart does not have an issue with a minimum one-year term.

<sup>6</sup> *See In the Matter of: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish Green Source Advantage Programs and Riders GSA*, Docket No. 2018-320-E, Comments of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC in Support of Green Source Advantage Voluntary Renewable Energy Program and Renewed Request for Program Approval, Exhibit A: DEC Rider GSA (clean), p. 1 (filed October 23, 2020) (allowing participating customers to enter into an application under the program for "up to twenty (20) years").

1 For example, if a customer is currently under a five-year electric service contract that  
2 includes a provision that renews the contract automatically for additional five-year  
3 terms, then under my reading of the tariff language, this customer is limited to a RG-  
4 Supply Agreement for a term of five years or less. This is concerning to Walmart  
5 because, as discussed above in our first concern, shorter term contracts limit a  
6 customer's options with regard to both Suppliers and pricing.

7 **Q. WHAT IS WALMART'S RECOMMENDATION WITH REGARD TO THIS SECOND TERM**  
8 **LIMITATION?**

9 A. The term limitations contained in the tariff language are expressly stated as "the  
10 lessor of" those two options. Thus, it appears the Company intends to further limit  
11 the overall 10-year limitation (or 20-year limitation if Walmart's recommendation  
12 above is adopted) by linking the contract term to the customer's electric service  
13 contract *without* taking into consideration any automatic renewals of that contract.  
14 Customers should receive the full benefit of the automatic renewal provisions in their  
15 electric service contracts. Accordingly, Walmart recommends that the Commission  
16 replace this term limitation with one that assumes the participating customer's  
17 electric service contract will automatically renew for the maximum number of  
18 renewal periods allowed under the governing renewal provision, up to the 10-year (or  
19 20-year) overall limitation.

20 If, on the other hand, the Company intends for this language to operate as  
21 recommended by Walmart, *i.e.*, the second limitation is applied taking into

Walmart Inc.  
Direct Testimony of Lisa V. Perry  
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1 consideration subsequent automatic renewal periods, then the Commission should  
2 modify the tariff language to clearly reflect this intent.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A.** Yes.



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**EXHIBIT LVP-1 OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART INC.**

# Lisa V. Perry

Senior Manager, Energy Services  
Walmart Inc.

Business Address: 2608 SE J Street, Bentonville, Arkansas 72716

Business Phone: (479) 274-0238

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## EXPERIENCE

September 2019 – Present

Walmart Inc., Bentonville, AR

Senior Manager, Energy Services

November 2017 – September 2019

Oram & Houghton PLLC, Round Rock, TX

Of Counsel, Energy Law

February 2016 – November 2017

Ray Quinney & Nebeker, P.C., Salt Lake City, UT

Of Counsel, Energy Law

September 2007 – February 2016

Welborn, Sullivan, Meck & Tooley, P.C., Denver, CO

Partner, Energy Law

## EDUCATION

2000 University of Florida Levin College of Law LL.M., Taxation

1999 University of Florida Levin College of Law J.D.

1996 University of South Florida B.A., Criminology

1993 University of South Florida B.A., Psychology

## FILED TESTIMONY

### 2020

Public Service Commission of South Carolina Docket No. 2020-125-E: In re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges.

Issue: General rate case.

Arkansas Public Service Commission Docket No. 16-036-FR: In the Matter of Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U.

Issue: Seeking five-year extension of Formula Rate Plan.

Colorado Public Utilities Commission Proceeding No. 20A-0204E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021-2023 Transportation Electrification Plan.

Issue: Seeking approval of utility's plan to encourage EV adoption in its service territory.

**Walmart Inc.**  
**Exhibit LVP-1**  
**South Carolina Docket No. 2019-209-E**

Commonwealth of Kentucky Public Service Commission Case No. 2020-00174: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and (5) All Other Required Approvals and Relief.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202000021: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Approving a Recovery Mechanism for Expenditures Related to the Oklahoma Grid Enhancement Plan.

Issue: Seeking approval of a rider that allows for interim recovery of costs associated with expenditures made to enhance the grid.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00015: Application of Appalachian Power Company For a 2020 Triennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Issue: General Rate Case.

Michigan Public Service Commission Case No. U-20697: In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief.

Issue: General rate case.

Florida Public Service Commission Consolidated Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, 20200071-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company *et al.*

Issue: Seeking approval of Storm Protection Plans submitted by Tampa Electric Company, Duke Energy Florida, LLC, Gulf Power Company, and Florida Power & Light Company.

Arkansas Public Service Commission Docket No. 20-027-U: In the Matter of the Application of Walmart Inc. for Approval to Bid Demand Response into Wholesale Electricity Markets Through an Aggregator of Retail Customers.

Issue: Seeking approval to bid demand response into MISO through a third-party aggregator.

Public Utility Commission of Texas Docket No. 49737, SOAH Docket No. 473-19-6862: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Acquisition of Wind Generation Facilities.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

Louisiana Public Service Commission Docket No. U-35324: Application of Southwestern Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources in Accordance with the MBM Order and the 1983 and 1994 General Orders.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

**Walmart Inc.**  
**Exhibit LVP-1**  
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Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00201: Application of Virginia Electric and Power Company for approval of its 2019 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia.

Issue: Seek approval to implement eleven new demand-side management programs, to extend existing programs - some with updated parameters and cost/benefit results, and to continue three rate adjustment clauses.

**2019**

Oklahoma Corporation Commission Cause No. PUD 201900048: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Selected Wind Facilities; A Determination there is a Need for the SWFs; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the SWFs; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO in Entitled.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00094: Application of Virginia Electric and Power Company for Approval of a 100 Percent Renewable Energy Tariff, Designated Rider TRG, Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

Issue: Seek approval of a 100 percent renewable energy tariff.

Public Service Commission of South Carolina Docket No. 2019-239-E: In re: Dominion Energy South Carolina, Incorporated's Request for Approval of an Expanded Portfolio of Demand Side Management Programs, and a Modified Demand Side Management Rate Rider.

Issue: Seeking approval of an expanded Demand Side Management Plan and modified Demand Side Management Rate Rider.

Arkansas Public Service Commission Docket No. 19-035-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire Wind Generating Facilities Pursuant to the Arkansas Clean Energy Development Act.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00154: Petition of Virginia Electric and Power Company for approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia, and for approval of an addition to the terms and condition applicable to electric service.

Issue: Seeking approval of certain expenditures relating to grid improvement and grid hardening.

**COMMISSION DOCKETS (Appearing as Attorney of Record)**

**2019**

Public Utility Commission of Texas Docket No. 49421: Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 19AL-0268E: In the Matter of Advice Letter No. 1797 Filed by Public Service Company of Colorado to Reset the Currently Effective General Rate Schedule Adjustment (“GRSA”) as Applied to Base Rates for all Electric Rate Schedules as well as Implement a Base Rate kWh Charge, General Rate Schedule Adjustment-Energy (“GRSA-E”) to Become Effective June 20, 2019.

Issue: General rate case, Phase I

**2018**

Public Utility Commission of Texas Docket No. 48371: Entergy Texas, Inc.’s Statement of Intent and Application for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 18M-0074EG: In the Matter of the Commission’s Consideration of the Impact of the Federal Tax Cuts and Jobs Act of 2017 on the Rates of Colorado Investor-Owned Electric and Natural Gas Utilities.

Issue: Commenced by the Commission to consider the impacts of the Tax Cut and Jobs Act of 2017 on the revenue requirements and rates of all Colorado investor-owned electric and natural gas utilities.

**2017**

Public Utility Commission of Texas Docket No. 47461: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project in Oklahoma.

Issue: Purchase of a wind generation facility and generation tie line.

Public Utility Commission of Texas Docket No. 47527: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 17A-0462EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand-Side Management Plan.

Issue: Seek Commission re-examination and approval of the overall objectives and structure of Public Service’s DSM initiatives to guide the Company in designing future DSM plans.

**Walmart Inc.**  
**Exhibit LVP-1**  
**South Carolina Docket No. 2019-209-E**

Public Utility Commission of Colorado Docket No. 17AL-0649E: In the Matter of Advice Letter No. 1748-Electric Filed by Public Service Company of Colorado to Revise its PUC No. 8-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective on Thirty Days' Notice.

Issue: General rate case, Phase I

Arkansas Public Service Commission Docket No. 17-038-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire a Wind Generating Facility and to Construct a Dedicated Generation Tie Line.

Issue: Purchase of a wind generation facility and generation tie line.

Louisiana Public Service Commission Docket No. U-34619: Application for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or 1994 General Orders.

Issue: Purchase of a wind generation facility and generation tie line.

## **2016**

Public Utility Commission of Colorado Docket No. 16AL-0048E: In the Matter of Advice Letter No. 1712-Electric Filed by Public Service Company of Colorado to Replace Colorado PUC No. 7-Electric Tariff with Colorado PUC No. 8-Electric Tariff.

Issue: General rate case, Phase II

Public Utility Commission of Colorado Docket No. 16A-0055E: In the Matter of the Application of Public Service Company of Colorado for Approval of its Solar\*Connect Program.

Issue: Implement a voluntary solar program offering participating customers the ability to offset their current supply of energy from the Public Service system with solar energy produced at a dedicated facility or facilities.

New Mexico Public Regulation Commission Docket No. 16-00276-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 533.

Issue: General rate case

## **INDUSTRY TRAINING**

- 2020 Practical Regulatory Training for the Electric Industry, Center for Public Utilities, New Mexico State University College of Business
- 2020 IPU Accounting and Ratemaking Course, Michigan State University
- 2016 Western NARUC Utility Rate School
- EUCI Courses on the utility industry, cost allocation, and rate design.